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6 Attorneys for Defendants  
ONE TOUCH DIRECT, LLC, and  
7 ONETOUCH DIRECT- SAN ANTONIO LLC

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10 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

11 ROBERT ROSS,

12 Plaintiff,

13 vs.

14 AT&T MOBILITY, LLC, ONE TOUCH  
DIRECT, LLC, and ONE TOUCH DIRECT-  
SAN ANTONIO, LLC,

15 Defendant.  
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Case No. 4:19-cv-6669-JST

**DECLARATION OF ALISSA R. PLEAU-FULLER IN SUPPORT OF JOINT STIPULATION AND REQUEST TO CONTINUE TRIAL AND OTHER RELATED DATES IN THE SCHEDULING ORDER; AND [PROPOSED] ORDER**

**CURRENT TRIAL DATE:** November 29, 2021  
**REQUESTED TRIAL DATE:** February 28, 2022

1 I, Alissa R. Pleau-Fuller, declare:

2 1. I am an attorney at law duly licensed to practice in the Northern District of  
3 California and am an attorney with the law firm of Buchalter, A Professional Corporation  
4 ("Buchalter"). Buchalter is the attorney of record for Defendants One Touch Direct, LLC and  
5 OneTouch Direct – San Antonio LLC ("OTD Defendants"). I have personal knowledge of the  
6 facts set forth in this declaration, and if called as a witness, could testify competently to those  
7 facts.

8 2. The OTD Defendants were just recently served with the First Amended Complaint  
9 and brought into the case in December 2020. The current October 2021 trial, the close of  
10 discovery and other related dates are fast-approaching and do not provide the OTD Defendants  
11 with adequate time to conduct discovery and prepare for trial.

12 3. Good cause exists to continue the trial and related dates as the OTD Defendants, as  
13 well as myself and Kevin Collins as counsel of record for the OTD Defendants, have not had an  
14 opportunity to fully evaluate the OTD Defendants' defenses in the case and will need to conduct  
15 discovery. This will require more time and a continuance of at least 90 days as to the various  
16 Scheduling Order dates.

17 I declare under penalty of perjury of the laws of the United States of America that the  
18 following is true and correct and that this Declaration was executed on February 8, 2021, at  
19 Davis, California.

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22 ALISSA R. PLEAU-FULLER